

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

SHANTA LYNETTE BROWN, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action: 6:23cv00054
)	
THE CITY OF LYNCHBURG, <i>et al.</i> ,)	
)	
Defendants.)	

JOINT MOTION FOR CONTINUANCE

NOW COME the parties to this matter, by counsel, and move the Court for a continuance of the jury trial date of the above captioned matter from August 13-16, 2024 to February 10-14, 2025, and in support state as follows:

1. This matter is currently set for a jury trial on August 13-16, 2024.
2. The Court issued its Order granting Defendants' amended motion for release and use of expunged records on April 8, 2024 (the "Order") (ECF 28). Prior to the Order, the parties were not permitted to discover the documented evidence related to subject incident.
3. Furthermore, the Court issued its memorandum opinion and order granting in part and denying in part Defendants' motion to dismiss on April 12, 2024 (the "Opinion") (ECF 29). Prior to the Opinion, the parties were uncertain as to which, if any, of Plaintiff's claims would survive.
4. Counsel for the parties have since conferred and agree that four months is insufficient time to conduct discovery, engage experts, and prepare for trial.
5. Counsel for the parties have requested the Court's availability for a four-day jury trial, which the Court provided to counsel for the parties on April 12, 2024.

6. Counsel for the parties have conferred and agree that February 10-14, 2025 are the dates that are most convenient for their schedules, and the Court has confirmed that those dates would be held pending the filing of a joint motion to continue the trial date and entry of an order granting the same.

7. A proposed order granting this motion is attached hereto as Exhibit 1.

Therefore, in order to provide the parties ample time to conduct discovery, engage experts, and prepare for trial, the parties respectfully request that the Court continue the jury trial from August 13-16, 2024 to February 10-14, 2025.

Respectfully submitted,

CITY OF LYNCHBURG, SETH REED,
ZACHARY MILLER, and ROBBIN MILLER

By /s/ John R. Fitzgerald

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